Benjamin Hart 1721 Gosnell Road, Unit 301 Vienna, Virginia 22182

FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

April 12, 2005

Ms. Beth Mizuno Attorney Office of the General Counsel Federal Election Commission Washington, D.C. 20463

MUR 5635

Dear Ms. Mizuno:

Concerning the Federal Election Commission's audit of the Conservative Leadership Political Action Committee (CLPAC), my postage loans were to American Target Advertising (ATA) for ATA's mail programs.

My loan agreement was with ATA and was guaranteed by ATA, not CLPAC. I advanced postage funds to ATA for many of its mail programs and many of its clients over many years. I relied on ATA's General Counsel Mark Fitzgibbons to make sure I was in compliance with all federal, state and local laws.

The interest rate I charged was anywhere from 1.5% to 2% per month (18-24% annualized). Lending funds for postage for ATA's many mail programs and clients was a significant part of my business from 1998-2003. Postage advances and loans are a common practice in the direct mail fundraising industry.

If I can be of any more assistance, please call me at 703-473-1672.

Sincerely,

The second of th

文文文字和特别的第三元·

्राता कर हुन्य अध्यक्त स्वर्तात के का के अध्यक्त है जनका है जनका है जा है। इस साम है जनकार प्रकार के प्रकार है जनकार साम है कि अपने के स्वराहित के अध्यक्त है जनकार साम है जिसकार साम है जिसकार साम है जिसकार साम है जिसकार ह

 $\frac{\partial}{\partial t} \frac{\partial}{\partial a_{ij}} \frac{\partial}{\partial t} \frac{\partial}{\partial t} \frac{\partial}{\partial t} = \frac{\partial}{\partial t} \frac{\partial}{\partial$